

REITLER KAILAS & ROSENBLATT LLP

885 Third Avenue, 20th Floor

New York, New York 10022

Main: 212-209-3050

Fax: 212-371-5500

Email: plicalsi@reiterlaw.com

Attorneys for Plaintiff Lynne Freeman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

LYNNE FREEMAN, an individual,

Plaintiff,

-against-

TRACY DEEBE-ELKENANEY P/K/A TRACY
WOLFF, an individual, EMILY SYLVAN KIM, an
individual, PROSPECT AGENCY, LLC, a New
Jersey limited liability company, ENTANGLED
PUBLISHING, LLC, a Delaware limited liability
company, MACMILLAN PUBLISHERS, LLC, a
New York limited liability company, UNIVERSAL
CITY STUDIOS, LLC, a Delaware limited liability
company

Defendants.

-----X

Case No. 1:22-cv-2435

**NOTICE OF MOTION FOR
ADMISSION OF MARK D.
PASSIN *PRO HAC VICE***

PLEASE TAKE NOTICE that, upon the attached Affirmation of Paul LiCalsi, dated March 28, 2022, and the exhibits attached thereto, Plaintiff Lynne Freeman, by her attorneys, Reitler Kailas & Rosenblatt LLP, hereby move this Court before the Honorable Analisa Torres of the United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, for an Order pursuant to Rule 1.3(c) of the Local Civil Rules for the Southern and Eastern Districts of New York admitting Mark D. Passin, Esq., *pro hac vice*, to act as co-counsel for Plaintiff in the above-captioned action.

Applicant's Contact Information:

Mark D. Passin, Esq.
CSReeder, PC
11766 Wilshire Boulevard, Suite 1470
Los Angeles, CA 90025
(310) 861-2475
mark@csrlawyers.com

Dated: New York, New York
March 28, 2022

Respectfully submitted,

**REITLER KAILAS &
ROSENBLATT LLP**

By: /s/ Paul LiCalsi

Paul LiCalsi
885 Third Avenue, 20th Floor
New York, New York 10022
Main: 212-209-3050
Email: plicalsi@reiterlaw.com

Attorneys for Plaintiffs